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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

CAROLE S. GAULER, PERSONAL  
REPRESENTATIVE OF THE ESTATE OF  
PAUL L. KLEIN,

Plaintiff,

vs.

INTERNAL REVENUE SERVICE,  
Department of the Treasury;  
DANIEL WERFEL, in his official capacity  
as Commissioner of Internal Revenue Service;  
DOES 1-X,

Defendants.

Case No.: 3:24-cv-00082-ART-CSD

**ORDER GRANTING STIPULATION  
TO EXTEND TIME TO BOTH  
OPPOSE AND REPLY IN SUPPORT  
OF DEFENDANTS' MOTION TO  
DISMISS FOR LACK OF  
JURSDICTION  
(First Request)**

Come now Plaintiff Carole S. Gauler, in her capacity as the Personal Representative of the Estate of Paul L. Klein, by and through counsel Patricia Halstead of Halstead Law Offices, and Defendants, by and through counsel Alexander Stevko, United States Department of Justice, Tax Division, and hereby stipulate to extend the deadline for Plaintiff to oppose, and for Defendants to reply in support of, the Motion to Dismiss for Lack of Jurisdiction, filed on behalf of Defendants on May 17, 2024. The parties stipulate that Plaintiff shall have up to and including July 1, 2024, by which to oppose the motion. Defendants will then have up to and including July 22, 2024, by which to file a reply. This extension is stipulated upon to accommodate the schedules of both counsel and is necessary in light of the Memorial Day and Fourth of July holidays and pre-

1 existing obligations. There has been no prior extension requested to respond or to reply to the  
2 motion.

3 Dated this 29th day of May 2024.

4 /s/ Patricia Halstead  
5 Attorney for Carole S. Gauler,  
6 Personal Representative of  
7 the Estate of Paul L. Klein

/s/ Alexander Stevko  
Trial Attorney, Tax Division  
U.S. Department of Justice  
Counsel for the United States

8  
9 IT IS SO ORDERED

10  
11 DATED this 31st day of May 2024

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14 U.S. DISTRICT COURT JUDGE